

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In Re:	Case No.: 10-01017 BKT
<b>WILFREDO GUITIERREZ GOMEZ</b>	Chapter 13
Debtor(s)	

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**MOTION TO INFORM AMENDED PLAN**

TO THE HONORABLE COURT:

**NOW COMES** the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to provide surrender of Christmas Bonus in order to increase the base.

**WHEREFORE**, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

**In San Juan, Puerto Rico this 6th day of April of 2010.**

JPC LAW OFFICE

José M Prieto Carballo, Esq.  
P.O. Box 363565  
San Juan, P.R. 00936-3565  
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jpc@jpclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

GUTIERREZ GOMEZ, WILFREDO

Debtor(s)

Case No. 10-01017 B

Chapter 13

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION	<input checked="" type="checkbox"/> AMENDED PLAN DATED: 4/06/2010 Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other							
<p><b>I. PAYMENT PLAN SCHEDULE</b></p> <table> <tr><td>\$ 400.00 x 2 = \$ 800.00</td></tr> <tr><td>\$ 450.00 x 58 = \$ 26,100.00</td></tr> <tr><td>\$ _____ x _____ = \$ _____</td></tr> <tr><td>\$ _____ x _____ = \$ _____</td></tr> <tr><td>\$ _____ x _____ = \$ _____</td></tr> </table> <p style="text-align: center;">TOTAL: \$ 26,900.00</p> <p>Additional Payments: \$ 2,000.00 to be paid as a LUMP SUM within <del>80X6010X</del> with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input checked="" type="checkbox"/> Other: CHISTMAS BONUS (\$500 X 4 YRS= \$2000)</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ 28,900.00</p> <p><b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,624.00</p> <p>Signed: <u>/s/ WILFREDO GUTIERREZ GOMEZ</u> Debtor</p> <p>Joint Debtor</p>		\$ 400.00 x 2 = \$ 800.00	\$ 450.00 x 58 = \$ 26,100.00	\$ _____ x _____ = \$ _____	\$ _____ x _____ = \$ _____	\$ _____ x _____ = \$ _____	<p><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input checked="" type="checkbox"/> Debtor represents no secured claims. <input type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to:  C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) ATTORNEY FEES TO BE PAID FIRST.</p> <p>DEBTOR WILL ASSUME RESIDENTIAL LEASE WITH MR. JOSE SANTIAGO.</p>	
\$ 400.00 x 2 = \$ 800.00								
\$ 450.00 x 58 = \$ 26,100.00								
\$ _____ x _____ = \$ _____								
\$ _____ x _____ = \$ _____								
\$ _____ x _____ = \$ _____								

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**  
**Continuation Sheet - Page 1 of 1****Executory Contracts - Assumed:**

JOSE SANTIAGO

Cr # \$

Label Matrix for local noticing  
0104-3  
Case 10-01017-BKT13  
District of Puerto Rico  
Old San Juan  
Tue Apr 6 12:14:47 AST 2010

CitiFinancial Inc  
P.O. Box 70919  
Charlotte, NC 28272-0919

GE MONEY BANK (JCPENNEY CREDIT SERVICES)  
C/O RECOVERY MANAGEMENT SYSTEMS CORP  
25 SE 2ND AVE, SUITE 1120  
MIAMI, FL 33131-1605

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

AEELA  
P O BOX 364508  
SAN JUAN, PR 00936-4508

CITI BANK  
P O BOX 364106  
SAN JUAN, PR 00936-4106

CITIFINANCIAL  
P O BOX 71587  
SAN JUAN, PR 00936-8687

CMPR, INC  
726 EXCHANGE STREET SUITE 700  
BUFFALO, NY 14210-1464

FIRST BANK OF PR  
P O BOX 19327  
SAN JUAN, PR 00910-1327

ISLAND FINANCE  
P O BOX 715404  
SAN JUAN, PR 00936

JEWELERS  
P O BOX 20432  
KANSAS CITY, MO 64195-0432

JOSE SANTIAGO  
PC 21 CARR 831 2ND SECCION  
LOMAS VERDES  
BAYAMON, PR 00956

MONEY EXPRESS  
BANKRUPTCY DIVISION  
PO BOX 9146  
SAN JUAN PR 00908-0146

PR ACQUISITIONS LLC  
250 MUÑOZ RIVERA AVENUE SUITE 1200  
HATO REY PR 00918-1814

PRESTAMAS  
P O BOX 11890  
SAN JUAN, PR 00922-1890

Recovery Management Systems Corporation  
For Capital Recovery II LLC  
As Assignee of JC Penney Consumer Puerto  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

Recovery Management Systems Corporation  
For Capital Recovery II LLC  
As Assignee of Sam's Club  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

WESTERN BANK  
P O BOX 1180  
MAYAGUEZ, PR 00681-1180

ALEJANDRO OLIVERAS RIVERA  
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PO BOX 9024062  
SAN JUAN, PR 00902-4062

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SAN JUAN, PR 00901-1938

WILFREDO GUTIERREZ GOMEZ  
PMB 182 UU1  
SANTA JUANITA  
BAYAMON, PR 00956

End of Label Matrix  
Mailable recipients 22  
Bypassed recipients 0  
Total 22